

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

FAIR FIGHT ACTION, INC, *et al.*,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

Civil Action No.  
1:18-cv-05391-SCJ

**PLAINTIFFS' STATUS REPORT IN ACCORDANCE WITH  
PARAGRAPH 12 OF THE COURT'S  
NOVEMBER 30, 2021, ORDER, ECF 641**

Plaintiffs report to the Court on the Parties' progress on various matters addressed in the Court's November 30, 2021, Order, ECF 641:

With the trial date continued until April 11, 2022, the Parties are cooperating to revise the current schedule to allow for an orderly completion of the remaining tasks. Those tasks include conducting three, possibly four, depositions the Parties have said they will take. The deponents are former State Election Board member Anh Le (whose deposition was postponed by agreement), Secretary of State witness Gabe Sterling, Ebenezer's witness Bronson Woods, and, possibly, former Senator David Perdue.

The parties are negotiating the extension of various deadlines and expect to be able to present the Court with a proposed Consent Order early next week. As the Court knows, Plaintiffs have filed an Emergency Motion to Exclude the Testimony of Defendants' "May Call" Witness David Perdue. Briefing will be complete by next Wednesday.

Respectfully submitted this, the 21st day of January, 2022.

*/s/ Allegra J. Lawrence*

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**CERTIFICATE OF SERVICE**

I hereby certify that, on January 21st, 2022, the foregoing **Plaintiffs’ Status Report in Compliance with Paragraph 12 of the Court’s November 30, 2021, Order, ECF 641** was filed with the Court using the ECF system, which will serve all counsel of record.

This, the 21st day of January, 2022.

*/s/ Allegra J. Lawrence*

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Allegra J. Lawrence